

Via ECF

August 21, 2023

Hon. Lorna G. Schofield
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *The Travelers Indem. Co., et al. v. Northrop Grumman Corp., et al.*,
 Case No. 16-civ-8778-LGS [rel. 1:12-cv-03040-KBF]**

Dear Judge Schofield:

Pursuant to the Court's October 12, 2022 Order (ECF 469) ("Stay Order"), we write on behalf of The Travelers Indemnity Company and The Travelers Indemnity Company of Connecticut ("Travelers"), Century Indemnity Company ("Century"), and Northrop Grumman Corporation and Northrop Grumman Systems Corporation ("NG") (collectively, "the Parties"), to provide an update regarding the status of the underlying *Romano* lawsuit. This is the seventh status letter in response to the Stay Order.

Consistent with the Parties' statements in their November 25 letter (ECF 472), the below is NG's status summary of the *Romano* lawsuit:

1. There have been no developments in the *Romano* litigation since the parties' prior status letter, submitted on July 10, 2023.
2. As noted in the July 10 status letter, the parties completed briefing the *Romano* plaintiffs' class certification motion and the parties' *Daubert* motions related to class certification experts. The completed briefing papers were filed with the court on June 7, 2023.
3. As previously noted, the *Romano* court did not establish any deadlines for any proceedings after the completion of this briefing. Thus, there are no existing case deadlines at this time.

In accordance with the Stay Order, the Parties will file the next status letter regarding the *Romano* litigation on or before October 5, 2023.

Respectfully submitted,

SIMPSON THACHER & BARTLETT LLP

COVINGTON & BURLING LLP

By: Lynn K. Neuner

Lynn K. Neuner
Summer Craig
425 Lexington Avenue
New York, New York 10017-3954
Tel.: (212) 455-2000
Fax: (212) 455-2502
lneuner@stblaw.com
scraig@stblaw.com

By: Georgia Kazakis

Georgia Kazakis
Daniel L. Russell Jr.
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Tel: (202) 662-6000
gkazakis@cov.com
drussell@cov.com

*Attorneys for Plaintiffs The Travelers Indemnity
Company and The Travelers Indemnity
Company of Connecticut*

*Attorneys for Defendants Northrop Grumman
Corporation and Northrop Grumman Systems
Corporation*

WHITE & WILLIAMS LLP

By: Shane R. Heskin

Shane R. Heskin
Adam M. Berardi
1650 Market Street
One Liberty Place, Suite 1800
Philadelphia, PA 19103-7395
Tel: (215) 864-6329
Fax: (215) 399-9603
heskins@whiteandwilliams.com
berardia@whiteandwilliams.com

*Attorneys for Nominal Defendant Century
Indemnity Company, eventual successor in
interest to Insurance Company of North
America*